



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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Mr. Richard Schassburger
Rocky Flats Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402-0928

**Subject: Technical Review Comments on Rocky Flats Plant
Draft Standard Operating Procedures (SOP)
FO.28, Rev. 0 Tank and Pipeline Investigation**

Dear Mr. Schassburger:

As a result of our review of the above referenced document, EPA has the following comments.

General Comments

This SOP initially states that it is for the investigation of abandoned tanks and pipes. However, at numerous places within the SOP the reader is given the impression that active units are being investigated. This SOP must be carefully reviewed and revised as necessary to clarify that all procedures are for abandoned units only.

A site-specific health and safety plan (HSP) is cited throughout the document. Therefore, Section 2.0 should clearly state that this SOP will be used with a site-specific HSP that accompanies each field sampling plan (FSP). Site-specific HSPs are critical to the safe conduct of operations described in this SOP.

Specific Comments

1. Section 3.0, Page 5. This section lists the training that personnel must complete prior to tank and pipeline investigations. The list must include confined space training now required by the Occupational Safety and Health Administration (OSHA).
2. Section 4.2, Page 7. This section lists specific tank characteristics that will direct the overall strategy of the investigation. It lists characteristics of past input to the tank as one of these. This section must also evaluate the possibility that incompatible wastes have been placed in tanks resulting in hazardous material formation.
3. Section 4.2, Page 7. This section lists specific tank characteristics that will direct the overall strategy of the

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- investigation. It states that depth to groundwater will be determined. However, the documentation required to make this determination (past remedial investigation (RI) reports) is not listed in Section 4.1 as an important source of information. Past RI reports should be included in Section 4.1.
4. Section 5.2.1, page 10, procedure 3. It is stated here that any waste generated during sampling will be handled in accordance with SOP FO.8. A determination must be made for wastes generated from sampling and if such wastes are hazardous, they must be handled appropriately.
 5. Section 5.2.2, page 11, procedure 1. How does one "make sure that the sampler is clean"? This should probably be specified in more detail.
 6. Section 6.2.1, page 16, paragraph 4. This paragraph discusses the removal of shielding or insulation, but does address the case where such materials are themselves hazardous wastes. This must also be addressed so that such materials are properly handled.
 7. Section 6.2.3.1, page 17. This section lists equipment and materials necessary to conduct a video inspection of pipelines. While such inspections may be quite beneficial in certain circumstances, the principles of waste minimization are an important consideration. Generation of unnecessary hazardous waste at great cost may result from indiscriminate use of video inspections.
 8. Section 6.2.3.3, page 20. The first part of this section discusses removal of sediments from pipelines but does not mention that a waste determination of such sediment needs to be performed. This must be added to the procedures of this section. In addition, the maximum pulling speed should probably be quite a bit less than the 30 feet per second listed here.
 9. Section 6.4, page 22. This section needs more detail regarding what types of pipelines are appropriate for pressure testing versus inert gas injection or other methods of leak detection. Also needed are specifics regarding time intervals for pressure testing.

If you have any questions or comments on this review, please contact Gary Kleeman of my staff at 294-1071.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project